

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

In re:	)	Case No. 11-40439-659
	)	Chapter 11
R & G ENTERPRISES, LLC,	)	
	)	
Debtor,	)	<b>DEBTOR'S MOTION TO DISMISS</b>
	)	<b>FOLLMAN NORTHLINE'S MOTIONS</b>
FOLLMAN NORTHLINE, LLC,	)	<b>FOR RELIEF FROM STAY AND</b>
	)	<b>FOR EXPEDITED HEARING</b>
Movant,	)	
vs.	)	Hearing Date: February 7, 2011
	)	Hearing Time: 10:00 a.m.
R & G ENTERPRISES, LLC,	)	Location: Courtroom 5 North
	)	
Respondent.	)	

R & G Enterprises, Debtor ("Debtor"), by and through its attorney, states as follows for its Motion to Dismiss Follman Northline's Motion for Relief from Stay and Motion for Expedited Hearing (the "Motions"):

1. The Motions should be dismissed for lack of jurisdiction under Local Bankruptcy Rule 4001-1 A.
2. Debtor was not served with a copy of the Motions as required by Local Bankruptcy Rule 4001-1 A.

WHEREFORE, Debtor requests that the Motions be dismissed and that the Court grant such other and further relief as it deems proper.

**Certificate of Service**

In addition to those parties served with this document by the Court's CM/ECF system, the undersigned served a true and complete copy of this document by first class mail or other means as indicated upon each of the parties at the addresses listed below, on February 5, 2011: None.

Dated: February 5, 2011

Karfeld Law Firm, P.C.

By: /s/ Edward J. Karfeld

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*Attorneys for Debtor*